

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GREATER BOSTON HOTEL EMPLOYEES,
LOCAL 26 TRUST FUND

Plaintiff,

v.

FENWAY CAMBRIDGE MOTOR HOTEL

Defendant.

CIVIL ACTION
NO. 04-10207-LPC

JOINT PROPOSED PRETRIAL SCHEDULE

Pursuant to the Notice of Scheduling Conference issued by this Court, counsel for the parties have conferred for the express purpose of (1) preparing a proposed pretrial schedule for the case that includes a plan for discovery, and (2) considering whether they will consent to trial by magistrate.

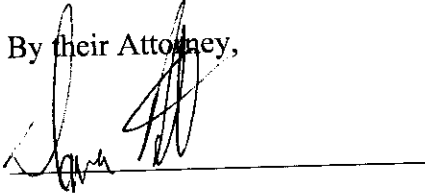
As a result of said conference between counsel, parties have agreed, subject to Court approval, to prepare for trial in accordance with the following proposed pretrial schedule.

a) Initial discovery disclosures pursuant to Rule 26(a)(1)(A), (B), (C) and (D) and a statement from Plaintiffs and Defendants pursuant to Local Rule 26.1(B)(1)(a)-(d) and 2(a)-(c) to be served no later than July 2, 2004.

- b) Initial discovery request (interrogatories and request for production of documents), to develop information needed for a realistic assessment of the case, to be served no later than September 1, 2004.
- c) After receipt of initial discovery the parties may file Rule 56 motions for partial or summary judgment no later than October 1, 2004.
- d) After receipt of responses to initial discovery request, Plaintiffs and Defendants may each take depositions to develop information needed for a realistic assessment of the case, until October 29, 2004 (if responses are delayed, the deposition schedule shall also be set back);
- e) All discovery shall be completed by November 30, 2004;
- f) A settlement Conference before a judicial officer in January 2005 on the date most convenient to the Court;
- g) Discovery shall be supplemented pursuant to Rule 26(e)(1) and (2);
- h) The number of interrogatories, request for production and request for admissions shall be limited in accordance with Local Rule 26.1(C) and the responses to such discovery shall be made within the time limits of Rules 33, 34, and 36;
- i) Any and all Rule 56 motions for partial or summary judgment to be filed on or before December 17, 2004; and
- j) In the event that factual issues remain to be tried, said trial is said to commence in February 2005.

For the Plaintiff,
GREATER BOSTON HOTEL
EMPLOYEES, LOCAL 26

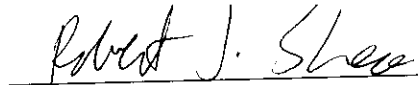
By their Attorney,



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For the Defendant,
FENWAY CAMBRIDGE MOTOR
HOTEL

By their Attorney,



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Dated: June 17, 2004

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